

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

PRESIDENT DONALD J. TRUMP,  
an individual,

Plaintiff,

v.

CBS BROADCASTING INC., a  
New York corporation and CBS  
INTERACTIVE INC., a Delaware Corporation

Defendants.

Case No.: 2:24-CV-00236-Z

**JURY TRIAL DEMANDED**

**THIRD CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO  
DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION AND IMPROPER VENUE OR, IN THE ALTERNATIVE,  
TO TRANSFER AND DEFENDANTS' MOTION TO DISMISS  
THE COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND  
FAILURE TO STATE A CLAIM**

Defendants CBS Broadcasting Inc. and CBS Interactive Inc. have filed (1) a “Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, In the Alternative, to Transfer,” and (2) a “Motion to Dismiss the Complaint for Lack of Subject Matter, Jurisdiction and Failure to State a Claim” (the “Motions”).

Plaintiff respectfully requests, per agreement of the Parties, that the Court extend until January 31, 2025 Plaintiff’s deadline to file an Amended Complaint in response to the Motions, or, in the alternative, to file oppositions to the Motions.

The Parties have further agreed that, if the extension is granted, Defendants will have until February 28, 2025 to file any responsive pleadings or renewed motions, or if Plaintiff files oppositions to the Motions, to file any reply papers.

The Parties have also jointly respectfully request that the deadline for the parties to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) be extended by a corresponding one week, to February 4, 2025, and that the deadline for the parties to file a joint proposed scheduling order be extended to February 11, 2025.

Plaintiff's counsel has conferred with counsel for Defendants, and all parties have consented to this motion in writing.

Respectfully submitted,

EDWARD ANDREW PALTZIK  
Texas Bar No. 24140402  
Bochner PLLC  
1040 Avenue of the Americas  
15th Floor  
New York, NY 10018  
(516) 526-0341  
[edwardb@bochner.law](mailto:edwardb@bochner.law)

/s/ Edward Andrew Paltzik  
Edward Andrew Paltzik

DANIEL Z. EPSTEIN  
Texas Bar No. 24110713  
16401 NW 37<sup>th</sup> Avenue, #209E  
Miami Gardens, FL 33054  
(202) 240-2398  
[dan@epsteinco.co](mailto:dan@epsteinco.co)

/s/ Daniel Z. Epstein  
Daniel Z. Epstein  
(*applying for admission pro hac vice*)

CHRIS D. PARKER  
Texas Bar No. 15479100  
Farris Parker & Hubbard  
A Professional Corporation  
P. O. Box 9620  
Amarillo, TX 79105-9620  
(806) 374-5317 (T)  
(806) 372-2107 (F)  
[cparker@pf-lawfirm.com](mailto:cparker@pf-lawfirm.com)

/s/ Chris D. Parker  
Chris D. Parker

**CERTIFICATE OF CONFERENCE**

I certify that on the 23<sup>rd</sup> day of January, 2025 I conferred with attorney Elizabeth McNamera, counsel for Defendants. Ms. McNamara stated that she is in agreement with this Motion.

/s/ Edward Paltzik  
Edward Paltzik

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 23<sup>rd</sup> day of January, 2025, via the Northern District of Texas's electronic filing notification system.

/s/ Chris D. Parker  
Chris D. Parker